

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**– against –**

**BARRY C. HONIG, MICHAEL BRAUSER,  
JOHN STETSON, JOHN R. O’ROURKE III,  
ROBERT LADD, ELLIOT MAZA, BRIAN KELLER,  
JOHN H. FORD, ATG CAPITAL LLC, GRQ  
CONSULTANTS, INC., HS CONTRARIAN  
INVESTMENTS, LLC, GRANDER HOLDINGS, INC.,  
and STETSON CAPITAL INVESTMENTS INC.,**

**Defendants.**  
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**18 Civ. 8175 (ER)**

**ECF CASE**

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS the Plaintiff Securities and Exchange Commission (“Commission”) has agreed to provide Defendant Ladd with a copy of the notes taken by an agent of the Federal Bureau of Investigation at various interviews of witnesses in its possession (the “Notes”), provided that Defendants agree to certain conditions;

WHEREAS Defendant Ladd agrees to those conditions;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between Ladd and the Commission, by and through his or its respective attorneys:

1. Notwithstanding paragraph 3 of the Stipulation and Confidentiality Order, entered June 5, 2019 (DE 134) (the “Confidentiality Order”), the Commission may designate the Notes as “Confidential” and the Notes shall thereafter be deemed “Confidential Discovery Materials” for all purposes under the Confidentiality Order.

2. Notwithstanding any other paragraph of the Confidentiality Order, should any party to this Stipulation wish to share a copy of the Notes with any other person or party, he or it must first obtain that person's or parties' agreement to abide by the terms of this Stipulation, in addition to the Confidentiality Order, in the form appended hereto as Exhibit A.

3. By disclosing the Notes to Ladd, the Commission has not waived, does not intend to waive, and shall not be deemed to have waived, any of the privileges or protections it has asserted with respect to the Notes or any like material.

Dated: New York, New York  
February 25 2020

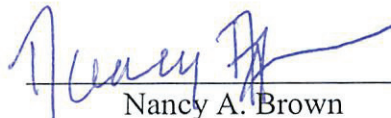
ROBERT LADD

SECURITIES AND EXCHANGE  
COMMISSION

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Attorneys for Plaintiff Securities and Exchange  
Commission

So Ordered:

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UNITED STATES DISTRICT JUDGE

